

MEMORANDUM ENDORSED

August 25, 2022

Via CM/ECF and EMAIL

Hon. Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
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**Re: *United States v. Bhardwaj*, No. 1:22-cr-00398-GHW
Defendants' Unopposed Request for Second Extension of Time
to Meet Bail Conditions**

Dear Judge Woods:

We write on behalf of all Defendants in the above-captioned matter to request a second reasonable extension to September 9, 2022, for our clients to satisfy the remaining bail conditions imposed by the Court during our clients' arraignment on August 2, 2022. We have conferred with the government, which consents to the requested extension.

On August 2, our clients appeared telephonically for their arraignment before the Honorable Katharine H. Parker. Judge Parker set bail conditions for each Defendant and released each on his own signature with remaining bail conditions for Defendant Abbas Saeedi to be met within 10 days [ECF No. 11], for Defendant Srinivasa Kakkerla to be met within 10 days [ECF No. 19], and for Defendant Amit Bhardwaj to be met within 14 days [ECF No. 15]. On August 12, all Defendants requested that the Court grant an extension until August 26 (tomorrow) for Defendants to satisfy the remaining bail conditions [ECF No. 29], which request the Court granted [ECF No. 30].

Since August 12, counsel for Defendants have continued to work diligently with the government to satisfy the remaining bail conditions, including conferring in person following the Court's August 17 status conference as well as over telephone and email. Despite such efforts, Defendants respectfully request another modest extension of time to ensure compliance, in particular so that financially independent cosigners for Defendants can be approved by the government and Defendants can complete the proper steps to secure their bonds with cash or property.

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Accordingly, Defendants respectfully request an extension of time to September 9, 2022, to satisfy the Court's remaining bail conditions.

Respectfully submitted,

/s/ Max C. Nicholas

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Counsel for Defendant Abbas Saeedi

Application granted. The time for the defendants to meet the remaining conditions of their pre-trial release is extended to September 9, 2022.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 35.

SO ORDERED.

Dated: August 26, 2022
New York, New York



GREGORY H. WOODS
United States District Judge